

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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J.K.J.,

Plaintiff,

Civil Action No. 15-cv-428-wmc

v.

POLK COUNTY AND  
DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE  
CORPORATION,

Intervenor.

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M.J.J.,

Plaintiff,

Civil Action No. 15-cv-433-wmc

v.

POLK COUNTY AND  
DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE  
CORPORATION,

Intervenor.

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**DECLARATION OF LIDA M. BANNINK**

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LIDA M. BANNINK declares, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury, that the following is true and correct:

1. I am attorney licensed in the State of Wisconsin and admitted to practice in the Western District of Wisconsin.
2. I am one of the attorneys representing Plaintiffs M.J.J. and J.K.J. in the above-captioned matter.
3. I make this Declaration in support of Plaintiffs' Motion to Alter or Amend a Judgment for prejudgment interest.
4. Attached are true and correct copies of the following documents:

EXHIBIT A: Excel spreadsheet with compound interest calculations for Plaintiff MJJ

EXHIBIT B: Excel spreadsheet with compound interest calculations for Plaintiff JKJ

5. I found the historical prime interest rates using the following resource: Board of Governors of the Federal Reserve System (US), *Bank Prime Loan Rate Changes: Historical Dates of Changes and Rates (PRIME)*, retrieved from FRED, Federal Reserve Bank of St. Louis, (February 20, 2018), <https://fred.stlouisfed.org/series/PRIME>.
6. I used a compound interest calculator found on the following resource: The Calculator Site, *Compound Interest Calculator* (February 20, 2018), <https://www.thecalculatorsite.com/finance/calculators/compoundinterestcalculator.php>.
7. I attempted to use the compound interest calculator contained on [www.investor.gov](http://www.investor.gov) which is provided from the U.S. Securities and Exchange Commission. However, it does not calculate interest for partial years. Interest must be calculated based on partial years given that the prime interest rate has changed 5 times since 2015.
8. The top of Exhibits A and B contain summary charts showing the time periods, applicable interest rates, interest earned during the time period, and total balance with principal and interest.
9. The bottom portions of Exhibits A and B contain calculation results during each of the applicable time period.

Dated this 21<sup>st</sup> day of February, 2018

/s/ Lida M. Bannink

Lida M. Bannink

Thomas J. Weidner

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